

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRAVELERS CASUALTY AND)	Case No. 1:15-cv-00608
SURETY COMPANY OF AMERICA,)	
as subrogee and assignee of)	District Judge: Milton I. Shadur
Alpine Bank,)	
)	Magistrate Judge: Daniel G. Martin
Plaintiff,)	
)	
vs.)	
)	
IGNITION STUDIO, INC.,)	
)	
Defendant.)	

DEFENDANT'S MOTION TO DISMISS

COMES NOW the Defendant, IGNITION STUDIO, INC., by and through its attorneys, Scott A. Calkins of RENO & ZAHM LLP, and hereby moves this Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), for the entry of an Order dismissing Count I of the Plaintiff's Complaint, or, in the alternative, dismissing Count II of Plaintiff's Complaint. In support of this Motion, Defendant submits its Memorandum of Law in Support of Defendant's Motion to Dismiss and incorporates the arguments in that Memorandum as the bases for this Motion.

Dated this 6th day of March, 2015.

IGNITION STUDIO, INC., Defendant,

By: /s/ Scott A. Calkins

One of Its Attorneys

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing was electronically served upon the registered CM/ECF users, and via U.S. Mail with postage fully prepaid, by depositing said envelope in a United States Post Office Mail Box in Rockford, Illinois upon any non-registered CM/ECF users in the above-entitled case on this 6th day of March, 2015.

By: /s/ Scott A. Calkins
Scott A. Calkins